

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORLAND DIVISION

THE GRAND JURY CHARGES:

COUNT 1

**(Possession of an Unregistered Firearm that requires Registration in the National Firearms
Registration and Transfer Record)
(26 U.S.C. § 5861(d))**

On or about February 28, 2023, in the District of Oregon, defendant **CHARLTON PIERCE GEPFORD**, did knowingly possess a firearm, that is, a silencer, a device for silencing, muffling or diminishing the report of a portable firearm, including any combination of parts, designed or redesigned, and intended for the use in assembling or fabricating a firearm silencer or firearm muffler, which had not been registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United State Code, Section 5861(d).

FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Count 1 of this Information, defendant **CHARLTON PIERCE GEPFORD** shall forfeit to the United States pursuant to 49 U.S.C. § 80303, 26 U.S.C. § 5872 & 28 U.S.C. § 2461, any firearms, including firearms

components, involved in or used in the commission of the offense, including but not limited to the following:

- Silencer
- RPD Receiver
- M2 Receiver plate
- M3 Reciever Plate
- Lahti 20 mm kit

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property described above.

Dated: April ____, 2025

Respectfully Submitted:

WILLIAM M. NARUS
Acting United States Attorney

/s/Nicole M. Bockelman
NICOLE M. BOCKELMAN, OSB #105934